Case No. 4:15-CV-00467 VC

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Plaintiff Terrance Haynie and Defendants United Airlines, Inc. and Continental Airlines, Inc. (collectively, "Defendants") hereby submit this STIPULATION TO TRANSFER VENUE TO EASTERN DISTRICT OF VIRGINIA AND PROPOSED ORDER pursuant to the Court's Order on April 9, 2015, at the Case Management Conference (Dkt. 20).

WHEREAS:

- 1. On April 9, 2015, the Court held a Case Management Conference for this action. During the conference, the parties agreed that Plaintiff's case should be transferred to another venue. Accordingly, the Court ordered the parties to file a stipulation to transfer venue and proposed order within 7 days of the Case Management Conference hearing. (See Minute Entry, Dkt. 20).
- 2. While the parties agreed to stipulate that venue should not be in the Northern District of California, they initially did not agree as to the judicial district to which venue should be transferred. Defendants contended that Plaintiff's case would be properly transferred to the Eastern District of Virginia; Plaintiff contended that his case was appropriate in the District of Columbia.
- 3. In light of the parties' agreement to transfer but disagreement as to the proper transferee court, the Court ordered Defendants to file a motion to transfer venue. (See Order, Dkt. 22).
- 4. Pursuant to the Court's Order, Defendants filed a Motion to Transfer Venue on May 1, 2015. (Dkt. 23).
- 5. The parties have since agreed to stipulate and consent to transfer Plaintiff's action to the United States District Court for the Eastern District of Virginia.
- 6. Defendants agree that their Motion to Transfer Venue (currently set for May 21, 2015 at 10:00 a.m.) should be taken off-calendar immediately upon the entry of the order to transfer.

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1	THEREFORE, THE PARTIES HEREBY STIPULATE AND REQUEST THAT THE	
2	COURT ORDER AS FOLLOWS:	
3	This action is hereby transferred to the United States District Court for the Eastern District	
4	of Virginia for all further proceedings.	
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6	DATED: May 7, 2015	LAW OFFICES OF JAMES LEONARD BROWN, APC JAMES LEONARD BROWN
7		
8		By:/s/ James Leonard Brown
9		JAMES LEONARD BROWN
10		Attorneys for Plaintiff
11		TERRANCE HAYNIE
12	DATED: May 7, 2015	DONNA M. MELBY
13		JENNIFER S. BALDOCCHI JI HAE KIM
14		PAUL HASTINGS LLP
15		
16		By: /s/ Donna M. Melby DONNA M. MELBY
17		Attorneys for Defendants
18		UNITED AIRLINES, INC. AND CONTINENTAL AIRLINES, INC.
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